

ESEA FLEXIBILITY Amendment Submission Template

Dear Assistant Secretary:

I am writing on behalf of the Rhode Island Department of Elementary and Secondary Education [(State educational agency) (SEA)] to request approval to amend the State's approved ESEA flexibility request. The relevant information, outlined in the *ESEA Flexibility Amendment Submission Process* document, is provided in the table below.

Flexibility Element(s) Affected by the Amendment	Brief Description of Element as Originally Approved	Brief Description of Requested Amendment	Rationale	Process for Consulting with Stakeholders, Summary of Comments, and Changes Made as a Result
2.A.i—State-Developed Recognition, Accountability, and Support System	See page 52 This is a clarification of how many consecutive years a school must miss the same AMO before being placed into the Warning Classification. The application should consistently read that a school must miss an AMO for three consecutive years.	Our original application was unclear about whether schools missing the same AMO for two consecutive years or three consecutive years would be placed into Warning Status regardless of their Composite Index Score. This led to some confusion in the field.	The original intent was to place schools in Warning only when it missed the same AMO for three consecutive years. The submitted document had typographical errors and we want to ensure that Rhode Island's document reflects its actual practice consistently.	We sent an email to all LEAs inviting comment and posted a public notice on our website. We invited discussion at an open portion of a State Board meeting and discussed the issue at two stakeholder meetings. We convened a committee of practitioners, which met in five two-hour sessions to review entire request and provided feedback and comment on RIDE proposals. We created a PowerPoint summarizing RIDE proposals and presented this information to the public via two webinars; all school districts and all media were notified of these webinars. We created an email address to receive comments and feedback. We met with groups representing students with disabilities and English learners, and provided these groups with

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				<p>requested documents and with our draft proposals.</p> <p>Some comments were received in support of the amendment; others expressed concern at being held accountable for additional subgroups of students. As a result, we will emphasize to our LEAs the importance of addressing the needs of all students and the support available to all schools to address these needs. Further, we will continue to emphasize that the consequence structure has changed under the flexibility to give LEA and schools greater incentive to address the needs of persistently underperforming subgroups.</p> <p>Attached are LEA comments submitted in response to the invitation to comment.</p>
2.A.i—State-Developed Recognition, Accountability, and Support System	See page 52 Rhode Island’s state testing program in English language arts and math used the NECAP assessments in	Rhode Island will transition to the PARCC testing program next year. We will use the PARCC data to inform the accountability of	Rhode Island adopted the Common Core State Standards (CCSS) in July of 2010 and have been a governing state in the PARCC consortium. We are confident that students have had the opportunity to learn and therefore will use	See above. Some comments were received regarding use of PARCC data for accountability going forward; RIDE responded that the renewal request is for one year only.

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	grades 3-11 and high school. Data from these assessments informed all of the metrics used in the CIS for elementary and middle schools and five of the seven for high schools.	elementary and middle schools but will continue to administer the NECAP for high school accountability. The PARCC high school assessments will be introduced next year and student data will be banked for future accountability use.	PARCC data for accountability purposes. We are continuing to use the NECAP tests for students graduating in 2015 and 2016. Therefore, we will use the NECAP data for school accountability.	
2.A.i- State Developed Recognition, Accountability, and Support System	See page 56. Students took the NECAP assessments in grades 3-8 and a high school assessment in the fall of each year. The tests measure the prior year's GLEs in grades 3-8 and measure the grade 9-10 GSEs in high school.	Students in grade 8 who are enrolled in a CCSS aligned Algebra I course can take the PARCC Algebra I assessment rather than the PARCC Grade 8 math assessment.	The PARCC Assessments are structured to align with coursework at the secondary level. We want to encourage middle school students who are enrolled in a rigorous Algebra I course to take the appropriate end-of-course PARCC assessment rather than the PARCC Grade 8 math test. We believe that requiring them to take two assessments (i.e. Algebra I and Grade 8) would be a disincentive to students and schools.	See above. No comments received on this matter.

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2.A.i—State-Developed Recognition, Accountability, and Support System	See page 11. AMO targets were differentiated for each district, school, and subgroup depending on its starting point in the baseline year, 2010-2011.	AMO targets will be reset for elementary and middle schools in 2014-2015 based on baseline data from PARCC testing.	We expect that student test results will be impacted by the transition to new standards and a new testing program. We want to use the first year of data to determine whether we need to reset the AMOs for schools.	See above. Comments received were supportive regarding using first year of PARCC data for setting baselines.
2.A.i—State-Developed Recognition, Accountability, and Support System	See page 12. Schools that persistently fail to attain AMOs will be placed into one of RIDE's three lowest accountability levels (Warning, Priority, or Focus).	Schools that have been identified previously as Priority and Focus will hold this classification in the 2015 accountability cycle unless they meet agreed upon criteria for exiting that status. No state assigned classifications (Warning, Typical, and Leading) will be assigned to schools based on their 2015 Composite Index Score. Rhode Island will identify Commended schools	Rhode Island will suspend the state developed classification labels for the 2014-2015 accountability cycle. The decision was made because this transition year will be used to help LEAs understand their data and the resultant changes in performance without having a label attached to the Composite Index Score. We will re-establish expectations based on the setting of new AMOs. Rhode Island stakeholders are particularly supportive of this request particularly because of the delay in the release of the Composite Index Score for 2014-15. There will be a short time span (approximately 6	See above. Comments were supportive of continuing to report Composite Index Scores while holding classifications in place during the year of transition, 2014-15.

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		based upon their Composite Index Scores.	months) between the release of the Composite Index Score and the next accountability cycle for the 2015-16 school year.	
2.A.i—State-Developed Recognition, Accountability, and Support System	See page 12. Rhode Island's accountability system is based on an index score comprised of seven metrics.	Elementary and middle schools will not use one of the metric that assigns points based on their progress to 2017 targets. The ten points assigned to that metrics will be reapportioned proportionately across the remaining metrics For the growth measure RI plans to calculate growth from NECAP to PARCC pending test performance alignment. RIDE will analyze PARCC assessment data to determine whether new cut points need to be established for	Elementary and middle schools will have new progress targets set using the 2014-2015 PARCC results as baseline data. As such, progress will not be determined.	See above. Comments were supportive on this matter.

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		metrics for elementary and middle schools. The metrics used for high schools will not change.		
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2.D.v	It was originally specified that schools would be required to meet 80% of performance targets and 90% of AMOs in order to be eligible for exit.	Strike the 80% performance target requirement and replace it with a judgment of satisfactory progress based quantitative and qualitative evidence gathered in the quarterly reporting/monitoring cycle	Performance targets vary widely between schools, depending on the particulars of their selected interventions, such that “meeting 80%” has little meaning. It was found that the 90% AMO criterion was in all cases the higher bar, requiring the largest improvements in summative student outcomes (i.e. the state assessment and graduation).	See above. No comments received on this matter.

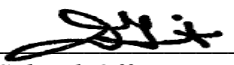
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2.E.ii	Originally, a commitment was made to monitor Focus schools bi-annually	RIDE has and plans to continue to monitored focus schools quarterly	As focus schools represent a difference of degree, rather than of kind, in our accountability system, we found quarterly monitoring to be more useful and rigorous than bi-annual monitoring	See above. No comments received on this matter.
2.E.iv	It was originally specified that schools would be required to meet 80% of performance targets and 90% of AMOs in order to be eligible for exit.	Strike the 80% performance target requirement and replace it with a judgment of satisfactory progress based quantitative and qualitative evidence gathered in the quarterly reporting/monitoring cycle	Performance targets vary widely between schools, depending on the particulars of their selected interventions, such that “meeting 80%” has little meaning. It was found that the 90% AMO criterion was in all cases the higher bar, requiring the largest improvements in summative student outcomes (i.e. the state assessment and graduation).	See above. No comments received on this matter.
2.F	RIDE will identify and classify 45 schools as Warning Schools. Warning schools will be so classified if they have a Composite Index Score (CIS) between 38.50	For the 2012-13 school year, 29 Title I schools were identified as Warning schools. These 29 schools were located in 12 different districts. 5 of the 12 districts	Title I Schools identified as Warning schools for the 2012-13 school year completed the RIDE Diagnostic Screen Process. Based on the results of that process, each Warning school developed a limited scope school reform plan (SRP) for RIDE approval	

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	<p>and less than 50.</p> <p>RIDE will intervene in Warning schools through a combination of a mandatory school-level diagnostic screen and the requirement that each warning school implement a limited-scale improvement plan. Warning schools will not be required to select a full intervention model, but rather will be required to implement the three core school improvement strategies and one additional</p>	<p>include identified Priority and Focus schools being monitored by RIDE's Office of Transformation.</p> <p>Based upon the findings of the Part B monitoring visit, RIDE will expand monitoring efforts with warning schools.</p>		

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	intervention strategy of their choice.			
3.B Ensure LEAs Implement Evaluation and Support Systems-Student Learning: The Growth Model	The section on pages 144-146 originally outlined RI's plan to implement growth scores as part of educator evaluation ratings in the 2013-2014 school year.	Growth score information will continue to be provided to educators. The scores will become part of educator evaluation ratings in the 2016-2017 school year.	The transition to a new assessment and a new assessment testing timeframe makes this change in timeline necessary. SLOs will continue to be used for all educators.	RI has consulted with Superintendents, principals, union leaders and others about the change in timeline. Additionally, this issue has been brought before our Technical Advisory Committee several times to understand the challenges with the transition. The feedback from the field overwhelming pointed to a change in timeline. Our technical committee also supported the change in timeline given the complexity of transition to a new assessment timeframe in addition to the new assessment.

Attached to this letter is a redlined version of our approved ESEA flexibility request with strikeouts and underlined additions to demonstrate how the request would change with approval of the proposed amendment[s]. Please contact David V. Abbott [State lead] at David.Abbott@RIDE.ri.gov or by phone at 401-222-8703 if you have any questions regarding these proposed amendments[s].

[SEA] acknowledges that the U.S. Department of Education may request supplementary information to inform consideration of this request.


 Chief State School Officer – Deborah A. Gist

May 12, 2014
 Date